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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PG&E'S 28-DAY REPORT FOR
OCTOBER 11-12, 2021 PSPS EVENT**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this 28-
2 day report for the October 11-12, 2021 Public Safety Power Shutoff (“PSPS”) event (the “PSPS
3 Event”) pursuant to the Court’s April 29, 2021 order. (Dkt. 1386.)

4 The information provided in this report is based on PG&E records reviewed as of the
5 date of this filing. The information is preliminary and subject to change and further validation.

6 *1. How many circuits were turned off in the PSPS.*

7 PG&E pre-emptively de-energized 95 distribution circuits as part of the PSPS Event.¹

8 *2. How many of such circuits had limbs and/or trees blown or fallen*
9 *onto the lines (as determined in the post-storm inspection).*

10 As part of PG&E’s post-event patrols prior to re-energizing distribution circuits,
11 PG&E identifies damage to PG&E’s assets that require repair or replacement and classifies those
12 conditions as an instance of “damage”. PG&E’s records reflect that, during the post-event patrols of
13 the 95 de-energized distribution circuits, conducted following the PSPS Event, such patrols
14 identified four instances of damage attributable to vegetation.²

15 PG&E’s post-event patrols also identify conditions that, in the judgment of the
16 personnel conducting the patrol, might have posed an electrical arcing risk or a risk of ignition had
17 the circuit been energized, even though there was no damage to PG&E equipment necessitating
18 repair, and classifies those conditions as “hazards”. PG&E’s records reflect that, during the post-
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21 ¹ Because PG&E understands the scope of the Court’s April 29, 2021 order to be focused on
22 distribution circuits, the information in this report relates only to distribution circuits. PG&E notes
23 that there were also three transmission circuits de-energized related to the October 11-12, 2021 PSPS
24 event. No damages or hazards were recorded during post-event patrols on these transmission
25 circuits. Of the transmission circuits in an HFTD which were not pre-emptively de-energized as part
26 of the PSPS Event, PG&E’s records reflect that no outages and no ignitions attributable to vegetation
27 occurred between the start of the PSPS event of 0700 PDT on October 11 and the final weather “all
28 clear” of 1253 PDT on October 12.

² PG&E’s records reflect that the post-event patrols identified three instances of non-vegetation-
related damage.

1 event patrols of the 95 de-energized distribution circuits, conducted following the PSPS Event, such
 2 patrols identified one instance of a hazard that was attributable to vegetation.³

3 *3. How many of such strikes would, in the judgment of PG&E, have*
 4 *started a fire (regardless of size) had the circuit been energized at the*
 5 *time of the strike.*

6 While PG&E is unable to determine whether any of the conditions identified in
 7 response to Question 2 would have started a fire, based on PG&E's post-event reporting patrols,
 8 PG&E is aware of five vegetation strikes that may have posed an electrical arcing risk or a risk of
 9 ignition had PG&E not de-energized the circuit as part of the PSPS event.

10 *4. How many circuits left energized had limbs and/or trees blown or*
 11 *fallen onto the lines by the storm without causing a fire.*

12 Of the circuits in an HFTD which were not pre-emptively de-energized as part of the
 13 PSPS Event, PG&E's ordinary course records reflect 12 sustained outages attributable to vegetation
 14 on 12 distribution circuits during the time period between the start of the PSPS event of 0700 PDT
 15 on October 11 and the final weather "all clear" of 1253 PDT on October 12 that were not associated
 16 with an ignition.⁴

17 *5. How many circuits left energized with strikes that in fact resulted in*
 18 *fires (regardless of size).*

19 Of the circuits in an HFTD which were not pre-emptively de-energized as part of the
 20 PSPS Event because they were not forecast to meet PG&E's PSPS criteria, PG&E's ordinary course
 21 records reflect that one fire (which was less than ten acres in size) was attributable to vegetation
 22 making contact with an energized distribution circuit during the time period between the start of the

23 ³ PG&E's records reflect that the post-event patrols did not identify any non-vegetation-related
 24 hazards.

25 ⁴ PG&E's response here does not include outages occurring below the distribution level, *i.e.*, on
 26 secondary lines or service drops which service as few as one customer. PG&E does not in the usual
 27 course identify whether each such outage is attributable to vegetation, as opposed to contact with
 28 other foreign objects.

1 PSPS event of 0700 PDT on October 11 and the final weather “all clear” of 1253 PDT on October
2 12.

3 *The above five categories should each be further broken down by*
4 *those circuits that were in substantial compliance with section 4293 as*
5 *well as PG&E’s Wildfire Mitigation Plan.*

6 To maintain compliance with Section 4293 and other regulatory requirements, all of
7 PG&E’s distribution circuits in HFTDs are scheduled for routine vegetation management and
8 CEMA patrols (and, as necessary, post-fire restoration patrols). Those patrols generate orders or tags
9 for work that are then worked according to their prescribed timelines, which depend on the priority
10 of tree work identified by the inspector. In Appendix A and Appendix B, PG&E provides the
11 information responsive to Questions 1-5 on a circuit-by-circuit basis, and for each listed circuit,
12 includes the number of vegetation management tags that PG&E’s records indicate had been created
13 prior to October 11, 2021 as part of PG&E’s routine vegetation management program, CEMA
14 program or post-fire restoration program, and not marked as complete by October 11, 2021.⁵
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25 ⁵ Vegetation work that was outstanding at this time related to other programs, such as EVM,
26 system hardening and reliability patrols, have been excluded from Appendices A and B. Vegetation
27 work called for by those programs is either not aimed at section 4293 compliance or goes beyond
28 what is required for section 4293 compliance.

1 Dated: October 19, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

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13 Attorneys for Defendant PACIFIC GAS AND
14 ELECTRIC COMPANY

Appendix A⁶**Distribution Circuits De-Energized as Part of the October 11-12, 2021 PSPS Event**

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority 1 ⁸	Priority 2 ⁹	Other ¹⁰
ANDERSON 1103	121	-	-	-	-	-	-
ANTELOPE 1101	157	-	-	-	-	-	388
ARBUCKLE 1101	192	-	-	-	-	-	490
ARBUCKLE 1104	85	-	-	-	-	-	183
AVENAL 2101	92	-	-	-	-	-	161
BIG BEND 1101	191	-	-	-	-	2	240
BRENTWOOD 2105	239	-	-	-	-	-	-
BUCKS CREEK 1103	143	-	-	-	-	-	-
CALISTOGA 1101	133	-	-	-	-	-	31
CALPINE 1144	248	-	-	-	-	-	755
CALPINE 1146	192	-	-	-	-	-	-
CAMBRIA 1102	128	-	-	-	-	-	-
CANTUA 1103	205	-	-	-	-	-	13
CARBONA 1101	230	-	-	-	-	-	5
CHOLAME 2102	236	-	-	-	-	-	409
CLARK ROAD 1102	25	-	1	1	-	-	985
CLAYTON 2212	220	-	-	-	-	-	9
CLOVERDALE 1102	19	-	-	-	-	-	735
COALINGA NO 1 1108	33	-	-	-	-	-	30

⁶ Please refer to the body of this filing for an explanation of the values included herein.

⁷ The circuit miles are the total miles for the circuit listed.

⁸ Priority 1 tags are used to identify vegetation that is (1) in contact or showing signs of previous contact with a primary conductor; (2) actively failing or at immediate risk of failing and could strike PG&E's facilities; or (3) presenting an immediate risk to PG&E's facilities.

⁹ Priority 2 tags are used to identify vegetation that (1) has encroached within the PG&E minimum clearance requirements and is not in contact with a conductor or (2) has an identifiable integrity issue that does not rise to the level of a Priority 1 condition but is likely to strike facilities and may manifest into a risk before the next scheduled inspection.

¹⁰ "Other" includes non-priority tags created as a part of PG&E's routine vegetation management program, CEMA program or post-fire restoration program.

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority ¹⁸	Priority ²⁹	Other ¹⁰
COALINGA NO 1 1109	107	-	-	-	-	2	127
COALINGA NO 2 1105	12	-	-	-	-	-	246
CORNING 1101	208	-	-	-	-	-	45
CORNING 1102	48	-	-	-	-	-	39
CORTINA 1101	53	-	-	-	-	1	60
COTTONWOOD 1103	128	-	-	-	-	-	-
CRESTA 1101	94	-	-	-	-	-	-
DESCHUTES 1101	13	-	-	-	-	-	-
DESCHUTES 1104	1	-	-	-	-	-	-
DEVILS DEN 1101	176	-	-	-	-	-	3
ELK CREEK 1101	181	-	-	-	-	1	438
GEYSERVILLE 1102	121	-	-	-	-	2	450
GIRVAN 1101	55	-	-	-	-	-	120
GLENN 1101	107	-	-	-	-	1	-
GUSTINE 1102	161	-	-	-	-	-	-
HIGHLANDS 1102	43	-	-	-	-	-	99
HIGHLANDS 1103	229	-	-	-	-	-	-
JESSUP 1102	42	-	-	-	-	-	-
JOLON 1102	238	-	-	-	-	4	210
JOLON 1103	176	-	-	-	-	1	189
KANAKA 1101	174	-	-	-	-	-	-
KETTLEMAN HILLS 2104	164	-	-	-	-	-	393
KING CITY 1106	135	1	-	1	-	-	-
KONOCI 1102	23	-	-	-	-	4	39
LAMONT 1102	55	-	-	-	-	-	341
LAMONT 1104	55	-	-	-	-	-	966
LOGAN CREEK 2102	42	-	-	-	-	-	-
LONE TREE 2105	98	-	-	-	-	-	-
LOS MOLINOS 1101	137	-	-	-	-	-	8
LOS OSITOS 2103	157	-	-	-	-	-	35
MADISON 1105	110	-	-	-	-	1	50
MADISON 2101	105	-	-	-	-	-	-
MAGUNDEN 1108	205	-	-	-	-	-	1
MAXWELL 1105	100	-	-	-	-	-	-
MIDDLETOWN 1101	79	-	-	-	-	-	219
MIDDLETOWN 1102	28	-	-	-	-	-	-

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority ¹⁸	Priority ²⁹	Other ¹⁰
MIDDLETOWN 1103	80	-	-	-	-	-	-
MONTICELLO 1101	278	-	-	-	-	-	-
OILFIELDS 1103	151	-	-	-	-	-	16
PANOCHE 1103	164	-	-	-	-	-	3
PANORAMA 1101	51	-	-	-	-	-	-
PANORAMA 1102	32	-	-	-	-	-	8
PERRY 1101	76	-	-	-	-	-	25
PUEBLO 1104	275	-	-	-	-	-	-
PUEBLO 1105	54	-	-	-	-	-	171
PUTAH CREEK 1102	38	-	-	-	-	-	43
PUTAH CREEK 1103	155	-	-	-	-	-	32
PUTAH CREEK 1105	258	-	-	-	-	13	365
RED BLUFF 1101	14	-	-	-	-	-	-
RED BLUFF 1103	52	-	-	-	-	-	-
RED BLUFF 1104	187	-	-	-	-	-	44
REDBUD 1101	156	-	-	-	-	-	5
SAN ARDO 1102	64	-	-	-	-	-	-
SAN MIGUEL 1106	88	-	-	-	-	31	615
SANTA NELLA 1104	138	-	-	-	-	-	-
SILVERADO 2102	492	-	-	-	-	-	57
SILVERADO 2104	107	-	-	-	-	-	10
SISQUOC 1102	85	-	-	-	-	-	-
SYCAMORE CREEK 1111	201	-	-	-	-	-	-
TASSAJARA 2104	117	-	-	-	-	-	-
TASSAJARA 2112	91	-	-	-	-	-	311
TEJON 1102	191	3	-	3	-	-	-
TEJON 1103	146	-	-	-	-	-	129
TEMPLETON 2110	62	-	-	-	-	-	443
TEMPLETON 2113	104	-	-	-	-	-	1
TYLER 1105	35	-	-	-	-	-	342
VACA DIXON 1101	259	-	-	-	-	-	-
VACA DIXON 1105	191	-	-	-	-	2	569
VACAVILLE 1104	192	-	-	-	-	-	80
VACAVILLE 1108	78	-	-	-	-	-	1,111
VACAVILLE 1111	65	-	-	-	-	-	-
VACAVILLE 1112	99	-	-	-	-	-	-

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority 1 ⁸	Priority 2 ⁹	Other ¹⁰
VASCO 1102	89	-	-	-	-	-	9
VOLTA 1101	162	-	-	-	-	-	-
WESTLEY 1103	109	-	-	-	-	13	454
ZACA 1102	139	-	-	-	-	-	83

Appendix B¹¹**Relevant Distribution Circuits Not De-Energized as Part of the October 11-12, 2021 PSPS Event¹²**

Circuit	Circuit Miles ¹³	HFTD Tier	Number of Vegetation-Related		Number of Outstanding Vegetation Tags		
			Outages	Ignitions	Priority 1 ¹⁴	Priority 2 ¹⁵	Other ¹⁶
AUBERRY 1101	378	Tier 2	1	-	-	-	755
BIG BASIN 1102	134	Tier 3	1	-	-	14*	427
CAMBRIA 1102	79	Tier 2	-	1	-	-	219
MARTELL 1103	49	Tier 2	1	-	-	-	128
MENLO 1103	91	Tier 2	1	-	-	-	3
MIWUK 1702	183	Tier 3	1	-	-	1*	40
MORAGA 1104	81	Tier 2	1	-	-	1*	5
ORO FINO 1102	200	Tier 3	1	-	-	-	128
ROB ROY 2104	261	Tier 2	1	-	-	2*	68
SALT SPRINGS 2102	109	Tier 2	1	-	-	-	662
SHINGLE SPRINGS 2109	343	Tier 2	1	-	-	-	-
SHINGLE SPRINGS 2110	107	Tier 3	1	-	-	-	-
WYANDOTTE 1109	238	Tier 2	1	-	-	-	62

* The presence of an outstanding Priority 2 tree tag on this circuit did not trigger inclusion in the initial scope for de-energization because the portion of the circuit associated with the Priority 2 tree work was not forecast to meet PG&E's minimum fire potential conditions.

¹¹ Please refer to the body of this filing for an explanation of the values included herein.

¹² Distribution circuits are included in this Appendix B if, during the PSPS event, (i) they were not de-energized and (ii) experienced a vegetation-related outage or ignition, as reflected in PG&E's records as of the date of this response.

¹³ The circuit miles are the total miles for the circuit listed.

¹⁴ Priority 1 tags are used to identify vegetation that is (1) in contact or showing signs of previous contact with a primary conductor; (2) actively failing or at immediate risk of failing and could strike PG&E's facilities; or (3) presenting an immediate risk to PG&E's facilities.

¹⁵ Priority 2 tags are used to identify vegetation that (1) has encroached within the PG&E minimum clearance requirements and is not in contact with a conductor or (2) has an identifiable integrity issue that does not rise to the level of a Priority 1 condition but is likely to strike facilities and may manifest into a risk before the next scheduled inspection.

¹⁶ "Other" includes non-priority tags created as a part of PG&E's routine vegetation management program, CEMA program or post-fire restoration program.